

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

HP INC., a Delaware corporation; and
**HEWLETT-PACKARD DEVELOPMENT
COMPANY, L.P.**, a Texas limited
partnership,

Plaintiffs,

v.

ZTHY TECH INC., a California corporation;
batterymon16, an entity of unknown form;
ehome007, an entity of unknown form;
elecbrain15, an entity of unknown form;
Idallian, an entity of unknown form; **irelia_jt**,
an entity of unknown form; **lol-electronic**, an
entity of unknown form; **shop-siker**, an entity
of unknown form; **shunwei2014**, an entity of
unknown form; **sunflower-electronic**, an
entity of unknown form; **suntek-wireless**, an
entity of unknown form; **yolanda_dh1**, an
entity of unknown form; and **DOES 1
through 20**,

Defendants.

Case No. 1:19-cv-07210-RPK-RER

**STIPULATION FOR ORDER
RELEASING FUNDS HELD BY PAYPAL,
INC.**

Judge: Honorable Rachel P. Kovner

STIPULATION

Plaintiffs HP, INC. and HEWLETT-PACKARD DEVELOPMENT COMPANY, L.P. along with Defendant batterymon16 (collectively, Plaintiffs and this defendant shall be referred to as the “Parties Concerned”) hereby stipulate and agree to this request for an Order that will direct PayPal, Inc. (“PayPal”) to release to Plaintiffs’ counsel funds held in certain accounts belonging to batterymon16 that have been restrained by previous orders of this Court. This transfer of funds is part of the bargained for consideration that the Parties Concerned have agreed must be provided as a condition precedent to settling this matter.

This Court has issued several Orders that directed PayPal to restrain funds belonging to batterymon16 that are held by PayPal. *See* Temporary Restraining Order (ECF Document # [“Doc.”] 13)); Order Entering A Preliminary Injunction Against Defendants Zthy Tech, Inc. and Batterymon16 by Consent (Doc. 33); Order Entering a Preliminary Injunction Against

Defendants Zthy Tech, Inc. and Batterymon16 by Consent (Doc. 38)(modifying Doc. 33); and, Order Entering a Preliminary Injunction Against Defendants Zthy Tech, Inc. and Batterymon16 by Consent (Doc. 64)(modifying Doc. 38). The Order requested by this stipulation is necessary to liberate the funds frozen by these Court Orders.

The Parties Concerned hereby agree and request that the Court enter an Order that directs PayPal to release the funds frozen in batterymon16's PayPal account to Plaintiffs, through their counsel, in order to help give effect to the settlement; and, that will allow PayPal to reactivate batterymon16's PayPal account, upon receiving notice from Plaintiffs' counsel, after batterymon16's obligations under the settlement agreement have been fully performed. The Proposed Order, attached as Exhibit A to this Stipulation, is acceptable to the Parties Concerned.

IT IS SO STIPULATED AND AGREED:

Dated: July 20, 2020

/s/ Louis P. Feuchtbaum

Louis P. Feuchtbaum
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Counsel for Plaintiffs HP Inc. and Hewlett-Packard Development Company, L.P.

Dated: July 20, 2020

/s/ Timothy T. Wang

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Attorney for Defendants Zthy Tech, Inc. and batterymon16

DECLARATION OF CONSENT OBTAINED FROM SIGNATORIES

I, Louis P. Feuchtbaum, hereby attest and declare, subject to penalty of perjury under the laws of the United States, that Timothy T. Wang, counsel for Defendant batterymon16, agreed to this stipulation and authorized me to indicate his assent by affixing his electronic signature to this document.

Dated: July 20, 2020

/s/ Louis P. Feuchtbaum

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